

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

KARNETRIA BENTLEY-BARNETT,

Plaintiff,

v.

GABRIEL G. GUILLERMO AND
TROPIC TRANSPORT F & Y, INC.,

Defendants.

Civil Action File No.:

NOTICE OF REMOVAL

TO: PLAINTIFF'S COUNSEL

Marcus A. Roberts
Marcus A. Roberts & Associates, LLC
1401 Peachtree Street, N.E. Suite 340
Atlanta, Georgia 30309

PLEASE TAKE NOTICE that Defendant Gabriel G. Guillermo, by and through his undersigned counsel of record, pursuant to U.S.C. §§ 1441 and 1332, and files this Notice of Removal of this action from the State Court for the County of Henry, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia, Atlanta Division.

In support of this Notice of Removal, the Defendant has filed contemporaneously herewith his Brief in Support of Removal and accompanying

Exhibits, including the pleadings and entire record of this matter.

WHEREFORE, Defendant Gabriel Guillermo respectfully requests that this Court enter an Order removing this action from the State Court for the County of Henry, State of Georgia, where it is now pending, to the United States District Court for the Northern District of Georgia, Atlanta Division.

Respectfully submitted this the 10th day of June, 2019.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

KEVIN T. SHIRES

State Bar No.: 643290

284 N. Main Street
Alpharetta, Georgia 30009
(678) 940-4413 (Direct)
(678) 940-4420 (Fax)
KShires@spgattorneys.com

CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that the foregoing document was prepared in accordance with N.D. Georgia Local Rule 5.1 and 7.1(D). Specifically, counsel certifies that she has used 14-point Times New Roman as the font in these documents.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

KEVIN T. SHIRES

State Bar No.: 643290

284 N. Main Street
Alpharetta, Georgia 30009
(678) 940-4413 (Direct)
(678) 940-4420 (Fax)
KShires@spgattorneys.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing document upon all parties to this matter by:

 x Electronically filing this document with CM/ECF which sends notice via that system to all parties and counsel pursuant to O.C.G.A. § 9-11-5(F) and/or U.S.C.R. 36.16(E)

 x Electronically serving this document via email pursuant to O.C.G.A. § 9-11-5 (F) and/or U.S.C.R. 36.16(E) as follows:

Marcus A. Roberts
Marcus A. Roberts & Associates, LLC
1401 Peachtree Street, N.E. Suite 340
Atlanta, Georgia 30309

This 10th day of June, 2019.

Shires, Peake & Gottlieb, LLC

/s/ Kevin T. Shires

KEVIN T. SHIRES

State Bar No.: 643290

284 N. Main Street
Alpharetta, Georgia 30009
(678) 940-4413 (Direct)
(678) 940-4420 (Fax)
KShires@spgattorneys.com